

United States District Court  
Southern District of Georgia

FILED  
U.S. DISTRICT COURT  
SAVANNAH DIV.

2025 JAN 27 P 1:21

CLERK   
SO. DIST. OF GA.

Angelina M. Fuller,  
Plaintiff

v.

Hyundai Motor Group Metaplant America,  
Defendant

CV 425 019

Case No.:

### COMPLAINT

Plaintiff, Angelina M. Fuller ("Plaintiff"), by and through herself as a pro se litigant, brings this action against Hyundai Motor Group Metaplant America ("Defendant") for discrimination, hostile work environment, retaliation, wrongful termination, and defamation of character in violation of federal laws and alleges as follows:

### I. JURISDICTION AND VENUE

1. This Court has jurisdiction over the claims in this Complaint under 28 U.S.C. § 1331 because Plaintiff's claims arise under federal law, specifically Title VII of the Civil Rights Act of 1964 (42 U.S.C. §2000e et seq.) and the Age Discrimination in Employment Act (29 U.S.C. §621 et seq.).
2. Venue is proper in this Court under 28 U.S.C. §1391(b) because the acts giving rise to this Complaint occurred at the Defendant's facility located in Savannah, Georgia, within this Court's jurisdiction.

### II. PARTIES

3. Plaintiff, Angelina M. Fuller, resides at 101 Carlisle Way, Savannah, GA 31419. Plaintiff was employed by Defendant as an Administrative Assistant and later as a Quality Control Inspector from approximately March 2024 until her wrongful termination on June 27, 2024.
4. Defendant, Hyundai Motor Group Metaplant America, is a corporation located at 1500 Genesis Dr., Ellabell, GA 31308. Defendant operates a manufacturing facility in Savannah, Georgia, where Plaintiff was employed.

### III. FACTUAL ALLEGATIONS

5. Plaintiff was initially hired as an Administrative Assistant but was reassigned to the role of Quality Control Inspector, where she demonstrated exceptional skills and completed all required training and certifications.
6. Plaintiff was subjected to a pattern of discriminatory and retaliatory actions, including but not limited to:
  - Unjustified alterations to her performance records.
  - Denial of opportunities for promotion despite exceeding qualifications.
  - Creation of unnecessary barriers to her professional advancement.
  - Intimidation tactics and isolation by coworkers and management.
7. Plaintiff experienced gender and age-based discrimination, with coworkers and supervisors expressing resentment over her rapid career progress.
8. Specific instances include:
  - Male coworkers and supervisors refused to update her certifications and skill test records.
  - Hostile and discriminatory remarks by her supervisor, Keith Prater, who told Plaintiff, "High achievers don't like low achievers."
  - Exclusion from advanced teams, such as the Pilot Team, despite her qualifications.

9. Plaintiff's complaints about workplace misconduct and discrimination were ignored or dismissed, and she was subjected to further retaliation.
10. Plaintiff was terminated on June 27, 2024, based on fabricated allegations of violence toward a coworker. Plaintiff asserts these allegations were false and part of a broader effort to harm her career.
11. Plaintiff filed a Charge of Discrimination with the Equal Employment Opportunity Commission (EEOC) on October 16, 2024 (EEOC File No. 4152024-01982). The EEOC issued a Right-to-Sue Letter, granting Plaintiff the authority to pursue this action in federal court.
12. On June 27, 2024, Defendant issued a Separation Notice stating that Plaintiff was terminated for alleged violations of the Workplace Threats and Violence Policy. Plaintiff asserts that these allegations were fabricated as pretext for discriminatory and retaliatory actions.
13. Twelve individuals, including Plaintiff's former supervisor, are willing to testify on her behalf, refuting the accusations and supporting her claims of discrimination and retaliation.

#### **IV. LEGAL CLAIMS**

##### **Count I: Discrimination in Violation of Title VII**

14. Plaintiff incorporates by reference the allegations in paragraphs 1 through 13 as if fully set forth herein.
15. Defendant's actions, including exclusion from advancement opportunities and wrongful termination, constitute unlawful discrimination based on Plaintiff's sex in violation of Title VII of the Civil Rights Act of 1964.

##### **Count II: Hostile Work Environment in Violation of Title VII**

16. Plaintiff incorporates by reference the allegations in paragraphs 1 through 15 as if fully set forth herein.
17. Defendant's conduct created a hostile work environment based on Plaintiff's gender, significantly interfering with her ability to perform her job duties.

##### **Count III: Retaliation in Violation of Title VII**

18. Plaintiff incorporates by reference the allegations in paragraphs 1 through 17 as if fully set forth herein.
19. Plaintiff's termination was in retaliation for her complaints about workplace misconduct and discrimination.

##### **Count IV: Wrongful Termination**

20. Plaintiff incorporates by reference the allegations in paragraphs 1 through 19 as if fully set forth herein.
21. Plaintiff's termination was unlawful and based on fabricated allegations designed to harm her career.

##### **Count V: Defamation**

22. Plaintiff incorporates by reference the allegations in paragraphs 1 through 21 as if fully set forth herein.
23. Defendant's false accusations of violence against Plaintiff were published to third parties and harmed Plaintiff's reputation, causing emotional distress and financial loss.

#### **V. PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that this Court:

1. Award Plaintiff compensatory damages in the amount of \$10,000,000 for emotional distress, lost wages, and reputational harm;
2. Award Plaintiff punitive damages in the amount of \$15,000,000 to deter Defendant's discriminatory and retaliatory conduct;
3. Award Plaintiff costs of litigation, including reasonable attorney's fees;
4. Grant injunctive relief requiring Defendant to implement policies preventing workplace discrimination and retaliation;
5. Grant such other relief as this Court deems just and proper.

**Dated:** January 15, 2025

**Respectfully Submitted,**

Angelina M. Fuller  
101 Carlisle Way  
Savannah, GA 31419  
Cell: 912-323-5214

**Pro Se Plaintiff**

*Angelina M. Fuller*  
*Jan. 27, 2025*

**Exhibits:**

- **Exhibit A: EEOC Charge of Discrimination (File No. 4152024-01982)**
- **Exhibit B: Separation Notice from Hyundai Motor Group Metaplant America (dated June 27, 2024)**

**CERTIFICATE OF SERVICE**

I hereby certify that on this **15th day of January, 2025**, I caused a true and correct copy of the following documents to be served upon the Defendant:

1. Complaint
2. Summons

The documents were served via **[Process Server/Certified Mail]** to the following:

Hyundai Motor Group Metaplant America  
1500 Genesis Dr.  
Ellabell, GA 31308

Respectfully submitted,

**Angelina M. Fuller**  
101 Carlisle Way  
Savannah, GA 31419  
Cell: 912-323-5214  
**Pro Se Plaintiff**

*Angelina M. Fuller*  
*Jan 27, 2025*